

COMMODORE SEMICONDUCTOR
ADMINISTRATIVE RECORD FILE *
INDEX OF DOCUMENTS

I. SITE IDENTIFICATION

1. U.S. EPA Potential Hazardous Waste Site Identification and Preliminary Assessment, Valley Forge Labs, 8/79. P. 100001-100004.
2. Letter to Mr. Gordon Epps, MOS Technologies, from Mr. William Beck, Jr., A.W. Martin Associates, Inc., re: Evaluation of soil and ground water contamination, 10/11/79. P. 100005-100012.
3. U.S. EPA Potential Hazardous Waste Site Log, Valley Forge Labs, 11/27/79. P. 100013-100013.
4. U.S. EPA Potential Hazardous Waste Site Tentative Disposition, 2/80. P. 100014-100015.
5. U.S. EPA Potential Hazardous Waste Site Final Strategy Determination, 2/80. P. 100016-100017.
6. U.S. EPA Potential Hazardous Waste Site, Site Inspection Report, 2/80. P. 100018-100027.
7. Letter to Mr. Timothy Jolly, Pennsylvania Department of Environmental Resources (PADER), from Mr. J. Gregory Hill, SMC Martin, re: Status of aquifer clean-up efforts, 5/12/81. P. 100028-100031. Information concerning the work plan is attached.
8. Letter to Mr. Tim Jolly, PADER, from Mr. J. Gregory Hill, SMC Martin, re: Update of aquifer clean-up efforts, 6/9/81. P. 100032-100033.
9. Letter to Mr. Timothy Jolly, PADER, from Mr. J. Gregory Hill, SMC Martin, re: Proposal for pipeline connection postponement, 6/30/81. P. 100034-100034.
10. Letter to Mr. Tim Jolly, PADER, from Mr. J. Gregory Hill, SMC Martin, Inc., re: Outline of the TCE clean-up effort, 9/24/81. P. 100035-100037. A proposed spraying scheme diagram is attached.
11. Letter to PADER from Mr. Donald F. Herring, U.S.

* Administrative Record File available 9/4/90, updated 7/21/92, 9/24/92, 10/26/92, 4/9/93, and 5/17/93.

Department of the Interior, re: Request for summary information, 10/11/83. P. 100038-100039. A list of sites is attached.

12. U.S. EPA Potential Hazardous Waste Site Tentative Disposition, Valley Forge Corporate Center, 10/25/83. P. 100040-100042. A desk memorandum is attached.
13. Letter to Mr. Donald F. Herring, U.S. Department of the Interior, from Mr. Michael Steiner, PADER, re: Transmittal of a tentative disposition, 11/3/83. P. 100043-100043.
14. Letter to Mr. Robert Young, PADER, from Mr. James G. Heil, Commodore Semiconductor Systems, re: Transmittal of a proposal for evaluation of ground water, 5/9/85. P. 100044-100046. A letter regarding the proposal is attached.
15. U.S. EPA Potential Hazardous Waste Site Identification, Commodore M.O.S., 5/17/85. P. 100047-100047.
16. Report: Site Inspection Report of Valley Forge Corporate Center, prepared by NUS Corporation, 10/30/85. P. 100048-100205.
17. Letter to Mr. Harold Byer, U.S. EPA, from Ms. Diane DeNardo, NUS Corporation, re: Transmittal of the Preliminary Form, 12/5/86. P. 100206-100212. The preliminary assessment form, a site location map, and a site sketch are attached.
18. Letter to Mr. Douglas Lorenzen, PADER, from Ms. Lorie Acker, re: Transmittal of preliminary assessment forms, 12/22/86. P. 100213-100213.
19. Letter to Mr. Russell H. Wyer, U.S. EPA, from Mr. Stephen King, Commodore Business Machines, Inc., re: Background on Commodore Semiconductor Site, 3/20/87. P. 100214-100238. Appendices A, B, and C are attached.

II. REMEDIAL ENFORCEMENT PLANNING

1. Administrative Order by Consent In the Matter Of:
Commodore Business Machines, Inc., 6/29/88.
P. 200001-200037.

Allen-Bradley Company, Inc.

2. Letter to Mr. Dick Beckman, Allen-Bradley Company, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200038-200042. Two certified mail receipts are attached.
3. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Richard C. Steinmetz, Allen-Bradley, re: 104(e) response, 4/15/88. P. 200043-200044.

Amkor Electronics

4. Letter to Amkor Electronics from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 4/12/88. P. 200045-200049. Two certified mail receipts are attached.
5. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Frank Marcucci, Amkor Electronics, re: 104(e) response letter, 4/12/88. P. 200050-200050.
6. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Frank J. Marcucci, Amkor Electronics, Inc., re: 104(e) response, 4/15/88. P. 200051-200052.

Audubon-Mobil Services

7. Letter to Mr. Rich McPhillips, Audubon-Mobil Services, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200053-200057. Two certified mail receipts are attached.
8. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Rich McPhillips, Audubon-Mobil Services, re: 104(e) response letter, 4/5/88. P. 200058-200058.
9. Letter to U.S. EPA from Mr. Rich McPhillips, McPhillips' Audubon-Mobil, re: 104(e) response, 4/13/88. P. 200059-200060. An envelope is attached.

Audubon Texaco

10. Handwritten letter to Ms. Billings, from Mr. Arthur Skaroff, Audubon Texaco, Inc., re: 104(e) response, 3/9/88. P. 200061-200074. The following are attached:
 - a) a site location map;
 - b) a copy of two Noble Oil Co. invoices and one James Gibbons invoice;
 - c) three Total Recovery, Inc., invoices;
 - d) eight uniform hazardous waste manifests.
11. Letter to Mr. Art Skaroff, Audubon Texaco, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200075-200079. Two certified mail receipts are attached.
12. Telephone conversation record of Ms. Suzanne Billings with Mr. Art Skaroff, re: Explanation of 104(e) response, 4/5/88. P. 200080-200080.

Burlington Industries

13. Letter to Burlington House Carpets from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200081-200085. Two certified mail receipts are attached.
14. Telephone conversation record of Ms. Suzanne Billings with Mr. Ritter, Burlington Industries, re: 104(e) response letter, 4/7/88. P. 200086-200086.
15. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. John D. Englar, Burlington Industries, Inc., re: 104(e) response, 4/11/88. P. 200087-200190. The supporting documentation referenced in the letter is attached.

Commodore Semiconductor Group

16. Letter to Mr. George Giansanti, Commodore Semiconductor Group, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notification of potential liability, 10/2/87. P. 200191-200197. Two certified mail receipts are attached.

17. Letter to Ms. Suzanne Billings, U.S. EPA, from Francis P. Newell, Montgomery, McCracken, Walker and Rhoads, re: Participation in the RI/FS, 10/16/87. P. 200198-200199. A hand delivery envelope is attached.
18. Letter to Mr. George Giansanti, Commodore Semiconductor Group, from Mr. James M. Seif, U.S. EPA, re: Good faith proposal for RI/FS, 11/5/87. P. 200200-200202. Two certified mail receipts are attached.
19. Page left intentionally blank. P. 200203-200203.
20. Letter to Ms. Suzanne Billings, U.S. EPA, from Francis P. Newell, Montgomery, McCracken, Walker and Rhoads, re: Proposal for RI/FS, 1/11/88. P. 200204-200215. Attachment I - site background and history, Figure 1 - a flow diagram of RI/FS activities, and Attachment II - the proposed statement of work are attached.
21. Letter to Mr. Francis P. Newell, Montgomery, McCracken, Walker and Rhoads, from W.C. Early for Mr. Cecil Rodrigues, U.S. EPA, re: Acceptance of good faith proposal, 1/14/88. P. 200216-200217.

Computer Peripherals, Inc.

22. Letter to Computer Peripherals, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200218-200222. Two certified mail receipts are attached.
23. Telephone conversation record of Ms. Suzanne Billings with Mr. Tom Ficca, Computer Peripherals, re: 104(e) response letter, 4/6/88. P. 200223-200223.
24. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Bart Nave, Advanced Environmental Technology Corporation (Computer Peripherals, Inc.), re: Scope of record collection, 4/6/88. P. 200224-200224.
25. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Ficca, Computer Peripherals, re: Manifests, 4/21/88. P. 200225-200225.

Den-tal-ez, Inc. (formerly Syntex Dental Products, Inc.)

26. Letter to Syntex Dental Products, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for

information, 3/31/88. P. 200226-200229. A certified mail receipt is attached.

27. Letter to Syntex Dental Products, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) letter, 3/31/88. P. 200230-200236. The following are attached:

- a) a site location map;
- b) an isoconcentration contour map, trichloroethene;
- c) an isoconcentration contour map, trans-1, 2-dichloroethene;
- d) an isoconcentration contour map, 1.1.1-trichloroethane.

28. Telephone conversation record of Ms. Suzanne Billings with Mr. Dave Coughlin, Den-tal-ez, re: Previous company operations, 4/5/88. P. 200237-200237.

29. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Dave Coughlin, Den-tal-ez, Inc., re: Extension for 104(e) response, 4/6/88. P. 200238-200238.

30. Telephone conversation record of Mr. Dave Coughlin, Den-tal-ez, with Ms. Suzanne Billings, U.S. EPA, re: Extension letter, 4/28/88. P. 200239-200239.

31. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. David A. Coughlin, Den-tal-ez, Inc., re: 104(e) response, 5/9/88. P. 200240-200278. Thirty-six hazardous waste manifests and the deed for the Montgomery County Facility are attached.

Douglass Super Top

32. Letter to Douglass Super Top from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200279-200283. Two certified mail receipts are attached.

33. Letter to Douglass Super Top from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) letter with handwritten response, 4/9/88. P. 200284-200287. An envelope is attached.

H.S. Crocker Company, Inc.

34. Letter to H.S. Crocker Company, Inc. from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200288-200292. Two certified mail receipts are attached.
35. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Joseph M. Fedgchin, H.S. Crocker Company, Inc., re: Extension for 104(e) response, 4/6/88. P. 200293-200293.
36. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Joe Fedgchin, H.S. Crocker Company, Inc., re: Extension for 104(e) response, 4/6/88. P. 200294-200294.
37. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Joe Fedgchin, H.S. Crocker Company, Inc., re: Deadline misunderstanding, 5/2/88. P. 200295-200296. Handwritten notes from the conversation are attached.
38. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Joseph Fedgchin, H.S. Crocker Company, Inc., re: 104(e) response, 5/20/88. P. 200297-200534. The supporting documentation referenced in the letter is attached.

Hewlett-Packard

39. Letter to Mr. Thomas Richey, Hewlett-Packard, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200535-200539. Two certified mail receipts are attached.
40. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Thomas C. Richey, Hewlett-Packard Company, re: 104(e) response, 4/7/88. P. 200540-200548. A letter concerning hazardous chemicals and a policy of title insurance are attached.

Edward A. Hildebrandt Auto Repair

41. Letter to Edward A. Hildebrandt Auto Repair, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200549-200553. Two certified mail receipts are attached.

42. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Ms. Debra Hildebrandt, Edward A. Hildebrandt Auto Repair, re: Questions about the 104(e) letter, 4/5/88. P. 200554-200554.
43. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Edward A. Hildebrandt, Jr., re: 104(e) response, 4/12/88. P. 200555-200618. The supporting documentation referenced in the letter is attached.

E.F. Houghton and Company

44. Letter to E.F. Houghton and Company from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200619-200623. Two certified mail receipts are attached.
45. Telephone conversation record of Ms. Suzanne Billings with Mr. Abrams, E.F. Houghton Company [sic], re: Scope of 104(e) response, 4/4/88. P. 200624-200624.
46. Telephone conversation record of Mr. Eadline, E.F. Houghton and Company, with Ms. Suzanne Billings, U.S. EPA, re: Confirmation of 4/4/88 conversation, 4/6/88. P. 200625-200625.
47. Telephone conversation record of Mr. Abrams, E.F. Houghton and Company, with Ms. Suzanne Billings, U.S. EPA, re: List of chemicals, 4/11/88. P. 200626-200626.
48. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Ellis Abrams, E.F. Houghton and Company, re: 104(e) response, 4/11/88. P. 200627-200635. A letter outlining requested information and seven lists of hazardous materials used by E.F. Houghton and Company are attached.
49. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Ellis Abrams, E.F. Houghton, re: Acceptability of 104(e) response, 4/25/88. P. 200636-200636.

ICI Americas, Inc.

50. Letter to Mr. Llew Williams, ICI Americas, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200637-200641. Two certified mail receipts are attached.
51. Telephone conversation record of Mr. Melford F. Tietze, ICI Americas, Inc., with Ms. Suzanne Billings, U.S. EPA, re: Request for 104(e) response extension, 4/6/88. P. 200642-200642.
52. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Melford F. Tietze, ICI Americas, Inc., re: Confirmation of telephone conversation, 4/6/88. P. 200643-200643.
53. Letter to Mr. Bruce P. Smith, U.S. EPA, from Mr. Melford F. Tietze, ICI Americas, Inc., re: Response to 104(e) inquiry, 5/13/88. P. 200644-200644.
54. Letter to Mr. Melford F. Tietze, ICI Americas, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 11/3/88. P. 200645-200649. Two certified mail receipts are attached.
55. Letter to Mr. Bruce P. Smith, U.S. EPA, from Mr. Melford F. Tietze, ICI Americas, Inc., re: 104(e) response, 11/21/88. P. 200650-200651.

Independence Communications

56. Letter to Independence Communications, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200652-200656. Two certified mail receipts are attached.
57. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. William J. Ahern, Independence Communications, Inc., re: 104(e) response, 4/7/88. P. 200657-200658. A letter regarding a previous drinking water supply problem at the site is attached.
58. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Frank Facciolo, Frank Facciolo Real Estate, re: Ownership of building located at the site, 4/11/88. P. 200659-200659.

Innova-Tech Inc.

59. Letter to Innova-Tech, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200660-200664. Two certified mail receipts are attached.
60. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. John T. Murphy, Innova-Tech, re: Response to the 104(e) letter, 4/11/88. P. 200665-200666.

Kimmel Lorah

61. Letter to Kimmel Lorah Associates from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200667-200671. Two certified mail receipts are attached.
62. Letter to the U.S. EPA from Mr. Donald Kimmel, Kimmel, Lorah and Associates, re: Response to the 104(e) letter, 4/15/88. P. 200672-200672.

Laser Magnetic Storage International Company

63. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Thomas A. Ficca, Laser Magnetic Storage International Company, re: 104(e) response extension, 4/6/88. P. 200673-200673.

Lee's Tire and Rubber Company

64. Letter to Mr. Guy Lee, Lee's Tire and Rubber Company, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200674-200678. Two certified mail receipts are attached.
65. Telephone conversation record of Mr. Thomas E. Greenwood with Ms. Suzanne Billings, U.S. EPA, re: Association with Lee's Tire and Rubber Company, 5/2/88. P. 200679-200679.
66. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Ms. Robin Crane, Lee's Tire and Rubber Company, re: Reluctance to send 104(e) response, 5/6/88. P. 200680-200680.
67. Telephone conversation record of Ms. Robin Crane with Ms. Suzanne Billings, U.S. EPA, re: Status of 104(e) response, 6/14/88. P. 200681-200681.
68. Letter to Ms. Suzanne Billings, U.S. EPA, from R.L.

Crane, The Kelly Springfield Tire Company, re:
Transmittal of an original response about Guy Lee,
6/20/88. P. 200682-200683. A letter concerning Mr.
Guy Lee is attached.

Manufacturers' Association of Delaware Valley

- 69. Letter to Manufacturer's [sic] Association of Del.
Valley, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e)
request for information, 3/31/88. P. 200684-200688.
Two certified mail receipts are attached.
- 70. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr.
Robert Hallenbeck, Jr., Manufacturers' Association of
Delaware Valley, re: Response to the 104(e) letter,
4/11/88. P. 200689-200694. A title for the Valley
Forge Industrial Park, Inc. is attached.

Nordson Corp.

- 71. Letter to Nordson Corp., from Mr. Bruce P. Smith, U.S.
EPA, re: 104(e) request for information, 3/31/88.
P. 200695-200698. A certified mail receipt is
attached.

Optech Office

- 72. Letter to Optech Office Products, Inc., from Mr. Bruce
P. Smith, U.S. EPA, re: 104(e) request for
information, 3/31/88. P. 200699-200702. A certified
mail receipt is attached.

PJM Interconnection

- 73. Letter to PJM Interconnection from Mr. Bruce P. Smith,
U.S. EPA, re: 104(e) request for information, 3/31/88.
P. 200703-200707. Two certified mail receipts are
attached.
- 74. Letter to Ms. Suzanne Billings, U.S. EPA, from M.H.
Porter, Pennsylvania New Jersey-Maryland
Interconnection, re: Request for a time extension,
4/6/88. P. 200708-200708.

75. Telephone conversation record of Mr. Bill Bryson with Ms. Suzanne Billings, U.S. EPA, re: Request for more information on the 104(e), 4/6/88. P. 200709-200709.
76. Telephone conversation record of Mr. Marvin Porter and Mr. Bill Bryson, PJM Interconnection, with Ms. Suzanne Billings, re: Request for time extension, 4/6/88. P. 200710-200710.
77. Letter to Mr. Bill Bryson, PJM Interconnection, from Ms. Suzanne Billings, re: Transmittal of information on hazardous substances, 4/12/88. P. 200711-200734. Information on substances is attached.
78. Letter to Ms. Suzanne Billings, U.S. EPA, from M.H. Porter, Pennsylvania New Jersey-Maryland Interconnection, re: Response to the 104(e) letter, 6/14/88. P. 200735-200951. Listing of hazardous substances and Material Safety Data Sheets are attached.
79. Handwritten notes on PJM Interconnection, (undated). P. 200952-200952.

R & M Associates

80. Letter to R & M Associates, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 200953-200957. Two certified mail receipts are attached.
81. Telephone conversation record of Mr. Steve Miano with Ms. Suzanne Billings, re: Inquiry into the Commodore Site, 4/11/88. P. 200958-200958.
82. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Steven Miano, Wolf, Block, Schorr and Solis-Cohen, re: Confirmation of time extension, 4/12/88. P. 200959-200959.
83. Letter to Mr. Steven T. Miano, Wolf, Block Schorr and Solis-Cohen, from Ms. Suzanne Billings, U.S. EPA, re: Transmittal of information pertaining to the Commodore site, 4/18/88. P. 200960-200980. Copies of 104(e) letters to PRPs and the owner are attached.
84. Telephone conversation record of Mr. Steve Miano with

Ms. Suzanne Billings, re: Request for time extension, 5/4/88. P. 200981-200981.

85. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Steve Miano, Wolf, Block, Schorr and Solis-Cohen, re: Confirmation of a time extension, 5/4/88. P. 200982-200982.
86. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. William Montgomery, R & M Associates, Inc., re: Response to the 104(e) letter, 5/18/88. P. 200983-201060. Response documents are attached.
87. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Steven Miano, Wolf, Block, Schorr and Solis-Cohen, re: 104(e) response, 5/20/88. P. 201061-201061.

Selomas, Inc.

88. Letter to Selomas, Inc. from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 201062-201066. Two certified mail receipts are attached.
89. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Jordan Warshafsky, Lohman Products, re: Selomas, Inc., 104(e) response letter, 4/8/88. P. 201067-201067.
90. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Jordan Warshafsky, Lohman Products, re: Selomas 104(e) response, 4/8/88. P. 201068-201068.

Tymshare, Inc.

91. Letter to Tymshare, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 201069-201073. Two certified mail receipts are attached.
92. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Jack Orlove, re: TymeShare [sic], 4/8/88. P. 201074-201074.
93. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Jack I. Orlove, McDonnell Douglas, re: Tymshare, Inc., 104(e) letter 4/8/88, P. 201075-201076. An envelope is attached.

94. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Brooks Pitchie, McDonnell Douglas Network Systems Company, re: Extension for Tymshare response, 5/2/88. P. 201077-201077.
95. Memorandum to Mr. R. Brooks Pitchie, McDonnell Douglas Field Service Company, from Mr. William Doyle, McDonnell Douglas Field Service Company, re: 104(e) response, 5/5/88. P. 201078-201095. Attachment A, a hazardous substance survey form, Attachment B, a material safety data sheet report, and Attachment C, a material data sheet report, are attached.
96. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. R. Brooks Pitchie, McDonnell Douglas, re: 104(e) response, 5/6/88. P. 201096-201097.

Volkswagen of America, Inc.

97. Letter to Mr. William Hichke [sic], Volkswagen [sic] of America, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 201098-201102. Two certified mail receipts are attached.
98. Telephone conversation record of Ms. Suzanne Billings, U.S. EPA, with Mr. Bill Thee and Mr. William Hichke [sic], Volkswagen [sic] of America, Inc., re: 104(e) response information, 4/12/88. P. 201103-201103.
99. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. William N. Thee, Jr., Volkswagen of America, Inc., re: 104(e) information to be provided, 4/19/88. P. 201104-201105.
100. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. William Hischke, Volkswagen of America, Inc., re: 104(e) response, 4/22/88. P. 201106-201117. The following are attached:
 - a) a description of process;
 - b) a description of treatment process;
 - c) a description of waste products;
 - d) a raw material list;
 - e) a waste disposal organizations sheet;
 - f) a toxic organic management plan.

Watson McDaniel Company

101. Letter to Watson McDaniel Co., from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 201118-201122. Two certified mail receipts are attached.
102. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. John N. Beck, Watson McDaniel, re: Response extension, 4/12/88. P. 201123-201123.
103. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. John N. Beck, Watson McDaniel, re: 104(e) response, 5/12/88. P. 201124-201125.

William F. Herr Company

104. Letter to William F. Herr Company from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 3/31/88. P. 201126-201129. A certified mail receipt is attached.

Updated Material

105. First Amendment To Administrative Order On Consent In The Matter Of: Commodore Semiconductor Group Site, Docket No. III-88-09-DC, (undated). P. 201129A-201129D. A cover letter is attached.
106. Administrative Order Directing Compliance With Request For Access In Re: Commodore Semiconductor Group Site, Valley Forge Recreations, Inc., Respondent, Docket No: III-90-88-09-DC, 10/31/90. P. 201130-201141. Figure 1-26, Possible Locations For Monitoring Wells At CSG Site and a letter regarding the installation of groundwater monitoring wells are attached.

Allen-Bradley Company, Inc.

107. Letter to Mr. Donald H. Davis, Jr., Allen-Bradley Company, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: General Notice letter, 2/27/92. P. 201142-201148. A certified mail receipt is attached.

E.F. Houghton and Company

- 108. Letter to Mr. William F. MacDonald, E.F. Houghton and Company, from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 1/15/92. P. 201149-201152.
- 109. Letter to Mr. Harry R. Steinmetz, U.S. EPA, from Mr. Bruce A. Schuck, E.F. Houghton and Company, re: Response to 104(e) request for information, 2/24/92. P. 201153-201159.

Frank Facciolo Real Estate

- 110. Letter to Mr. Frank Facciolo, Frank Facciolo Real Estate, from Mr. Kenneth R. Kryszczun, U.S. EPA, re: 104(e) request for information, 10/4/91. P. 201160-201164. A certified mail receipt is attached.
- 111. Letter to Mr. Harry R. Steinmetz, U.S. EPA, from Mr. Frank Facciolo, Frank Facciolo Real Estate, re: Response to 104(e) request for information, 10/15/91. P. 201165-201166.

ICI Americas Inc.

- 112. Letter to Mr. John P. Lynch, ICI Americas Inc., from Mr. Kenneth R. Kryszczun, U.S. EPA, re: 104(e) request for information, 9/23/91. P. 201167-201171. A certified mail receipt is attached.

Integrated Circuit Systems Inc.

- 113. Letter to Mr. H. Charles Wilson, Integrated Circuit Systems Inc., from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 1/15/92. P. 201172-201176. A certified mail receipt is attached.
- 114. Letter to Mr. Harry R. Steinmetz, U.S. EPA, from Mr. H. Charles Wilson, III, re: Response to 104(e) request for information, 4/9/92. P. 201177-201178.
- 115. Letter to Ms. Kirsten L. Erickson, NOAA General Counsel's Office, and Mr. Peter Knight, U.S. EPA, from Ms. Ruth Rzepski, U.S. EPA, re: 122(j) notification - consent decree for remedial design and remedial action, 7/30/92. P. 201179-201180.
- 116. Letter to Mr. Daniel Shillito, Department of the

Interior (DOI), and Mr. Don Henne, Office of Environmental Affairs, from Ms. Ruth Rzepski, U.S. EPA, re: 122(j) notification - consent decree for remedial design and remedial action, 7/30/92. P. 201181-201182.

Updated Material

Allen-Bradley Company, Inc.

117. Letter to Mr. Donald H. Davis, Jr., Allen-Bradley Company, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Commodore Semiconductor Group Site: Special notice letter for negotiations for the Remedial Design and Remedial Action and demand for payment for remedial activities, 10/09/92. P. 201183-201188. A certified mail receipt is attached.
118. Letter to Ms. Sarah Keating, U.S. EPA, from Mr. G. Wayne Renneisen, Harvey, Pennington, Herting & Renneisen, Ltd., re: Request to schedule a meeting with EPA to discuss negotiations between Allen-Bradley Company and Commodore Business Machines, 11/20/92. P. 201189-201190.
119. Letter to Ms. Sarah Keating, U.S. EPA, from Mr. Bruce D. Lombardo, Harvey Pennington, Herting & Renneisen, Ltd., re: Request for an extension for submission of the good faith offer in response to EPA's special notice letter, 12/11/92. P. 201191-201194.
120. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. G. Wayne Renneisen, Harvey, Pennington, Herting & Renneisen, Ltd., re: Submission of good faith offer on Allen-Bradley Company's terms, 12/18/92. P. 201195-201204.
121. Letter to Mr. Bruce D. Lombardo, Harvey, Pennington, Herting & Renneisen, Ltd., from Ms. Sarah Keating, U.S. EPA, re: Response to the December 11, 1992, request for an extension of the deadline for submission of a good faith offer, 1/21/93. P. 201205-201207.
122. Letter to Mr. Donald H. Davis, Jr., Allen-Bradley Company, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Response to counsel's letter of December 18, 1992 concerning inability to submit a good faith proposal, 1/27/93. P. 201208-201209.

Commodore Business Machines, Inc.

123. Letter to Mr. Edward Goff, Commodore Business Machines, Inc., from Mr Abraham Ferdas, U.S. EPA, re: Commodore Semiconductor Group Superfund Site: Special notice letter for negotiations for the Remedial Design and Remedial Action and demand for payments for remedial activities, 10/09/92. P. 201210-201215. Two certified mail receipts are attached.

Commodore International Limited

124. Letter to Mr. Edward Goff, Commodore International Limited, from Ms. Sarah Keating, U.S. EPA, re: Response to letter dated November 18, 1992 concerning good faith offer and EPA rejection of good faith proposal, 12/01/92. P. 201216-201216.
125. Letter to Ms. Ruth Rzepski, U.S. EPA from Mr. Edward Goff, Commodore International Limited, from Ms. Sarah Keating, U.S. EPA, re: Commodore's willingness to present a good faith offer to conduct and finance RD/RA for site, 12/14/92. P. 201217-201222.
126. Letter to Mr. Edward Goff, Commodore International Limited, from Mr. Abraham Ferdas, U.S. EPA, re: EPA's rejection of Commodore International's good faith offer, 12/23/92. P. 201223-201224.
127. Letter to Mr. Abraham Ferdas, U.S. EPA, from Mr. J. Edward Goff, Commodore International Limited, re: Restatement of Commodore's good faith offer to perform RD/RA, 1/12/93. P. 201225-201227.

ICI Americas

128. Letter to Dr. Bernard Lochtenberg, ICI Americas, Inc., from Abraham Ferdas, U.S. EPA, re: General notice letter for liability for response activities and costs, 2/19/93. P. 201228-201235. A certified mail receipt is attached.

Updated Material

Allen-Bradley Company, Inc.

130. Letter to Mr. Donald H. Davis, Jr., Allen-Bradley

Company, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notice of potential liability, 2/27/92. P. 201236-201242. A certified mail receipt is attached.

Northwestern Mutual Life Insurance Company

132. Letter to Mr. Mason Ross [sic], Northwestern Mutual Life Insurance Company, from Mr. Abraham Ferdas, U.S. EPA, re: Notice of potential liability, 4/30/93. P. 201243-201250. A certified mail receipt addressed to Mr. Mason Ross and a certified mail receipt addressed to Mr. Mason Rose are attached.

III. REMEDIAL RESPONSE PLANNING

1. Report: Final Report Technical Review of Documents, Commodore, prepared by Versar, Inc., 10/6/87. P. 300001-300076.
2. Report: Preliminary Health Assessment for Commodore Semiconductor Site, prepared by Office of Health Assessment, Agency for Toxic Substance and Disease Registry (ATSDR), 9/29/88. P. 300077-300080.
3. Report: Work Plan for the Remedial Investigation and Feasibility Study of the CSG Facility, prepared by Roy F. Weston, Inc., 1/89. P. 300081-300157.
4. Report: Remedial Investigation Site Operations Plan for the Remedial Investigation and Feasibility Study at the CSG Facility, Vol. I, Part I, prepared by Roy F. Weston, Inc., 7/89. P. 300158-300451.
5. Report: Remedial Investigation Site Operations Plan for the Remedial Investigation and Feasibility Study of the CSG Facility, Vol. II, Parts 2, 3, and 4, prepared by Roy F. Weston, Inc., 7/89. P. 300452-300553.
6. Handwritten letter to "Mike" from Mr. Stan E. Robert, Roy F. Weston, Inc., re: Audubon Monitoring Well #3, 7/11/89. P. 300554-300563. The following are attached:
 - a) a letter concerning installation of a second well;
 - b) a sketch map of the proposed well location;
 - c) a letter concerning property sale;
 - d) a second sketch map for the second well;
 - e) a letter concerning an observation well;
 - f) a letter concerning permission to drill another well;
 - g) a letter concerning the first observation well;
 - h) a letter concerning VFCC Water Company well #4.

7. Letter to Mr. Richard Ng, Commodore Semiconductor Systems, from Mr. Michael Towle, U.S. EPA, re: Summary of unresolved issues, 7/11/89. P. 300564-300565.
8. Letter to Ms. Martha Russell, Audubon Water Company, from Mr. Michael Towle, U.S. EPA, re: Summary of unresolved issues, 7/11/89. P. 300566-300567.
9. Letter to Mr. Leon Gonshor, PADER, from Mr. Neil R. Swanson for Mr. Peter Schaul, U.S. EPA, re: Water supply well at the Commodore Site, 7/12/89. P. 300568-300569.
10. Letter to Mr. Michael Towle, U.S. EPA, from Mr. John R. Marks for Ms. Katherine A. Sheedy, Roy F. Weston, Inc., re: Remedial Investigation Site Operations Plan (RISOP), 7/27/89. P. 300570-300601. A document identifying location in RISOP where Weston made revisions, with handwritten comments, is attached.
11. Letter to Mr. Richard Ng, Commodore Semiconductor Systems, from Mr. Michael Towle, U.S. EPA, re: Sampling of residential wells, 8/10/89. P. 300602-300602.
12. Letter to Mr. Michael Towle, U.S. EPA, from Mr. Stan E. Robert, for Ms. Katherine Sheedy, Roy F. Weston, Inc., re: Addenda to the Commodore RISOP, 11/14/89. P. 300603-300646. The addenda are attached.
13. Memorandum to file from Mr. Jay Newbaker, PADER, re: Quarterly ground water monitoring, 11/14/89. P. 300647-300649. A desk memorandum is attached.
14. Memorandum to file from Mr. Michael Towle, U.S. EPA, re: RI/FS oversight trip, 11/16/89. P. 300650-300651. Notes on deviations are attached.
15. Handwritten note to "Suzanne" from "Bill", re: Check samples, (undated). P. 300652-300654. A letter concerning sample results is attached.
16. Letter to Mr. Richard Ng, Commodore Semiconductor Systems, from Ms. Ruth Rzepski, U.S. EPA, re: EPA approval of the deletion of Task 3.1 - Focused Feasibility Study on In-Situ Violation from the RI/FS Work Plan, 10/22/90. P. 300655-300656.

17. Report: Commodore Semiconductor Group Request for Elimination of Focused Feasibility Study, prepared by Roy F. Weston, Inc., 3/12/91. P. 300657-300678. A cover letter is attached.
18. Letter to Mr. Richard Ng, Commodore Semiconductor Group, from Ms. Ruth Rzepski, U.S. EPA, re: Problems with the approach to the Risk Assessment and modifications to be made, 4/4/91. P. 300679-300681.
19. Letter to Mr. Richard Ng, Commodore Semiconductor Systems, from Ms. Ruth Rzepski, U.S. EPA, re: Draft RI/FS Report dated October 1991, 1/2/92. P. 300682-300733. General comments on the draft RI/FS Report and EPA comments on the air quality assessment related to the air stripper emissions at the site are attached.
20. Letter to Mr. Richard Ng, Commodore Semiconductor Systems, from Ms. Ruth Rzepski, U.S. EPA, re: Draft Feasibility Study Report comments, 1/9/92. P. 300733A-300733K. Comments on the Feasibility Study Report which EPA disapproved by letter on January 2, 1992 are attached.
21. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Richard C. Johnson, Roy F. Weston, Inc., re: Commodore and Weston's understanding of key issues raised by the U.S. EPA and PADER in comments to the draft RI/FS Report, 1/29/92. P. 300734-300737.
22. Report: Remedial Investigation and Feasibility Study of the CSG Facility at 950 Rittenhouse Road, Norristown, Pennsylvania, prepared by Roy F. Weston, Inc., 2/92. P. 300738-301715. A cover letter is attached.
23. Letter to Mr. Don Henne, U.S. Department of the Interior, from Ms. Ruth Rzepski, U.S. EPA, re: Feasibility Study portion of the RI/FS, 2/28/92. P. 301716-301716.
24. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Steven E. Jakatt, Roy F. Weston, Inc., re: Letters concerning protected or endangered species within one mile of the site, 3/4/92. P. 301718-301735. The following are attached:
 - a) a letter regarding the absence of fishes, amphibians, of reptiles near the immediate

vicinity of the site;

- b) a letter regarding the Pennsylvania Natural Diversity Inventory (PNDI) review of the site;
- c) a PNDI species list;
- d) a PNDI direct contribution form;
- e) a letter containing information on species occurring at or near the site;
- f) a Pennsylvania Fish and Wildlife Data Base sheet;
- g) a Project Area Species List - Master List;
- h) a Project Area Endangered and Threatened Species List;
- i) an Endangered/Threatened/Special Concern Species List for Vicinity.

25. Letter to Mr. David Everret, Delaware River Basin Commission, from Mr. Peter Schaul, U.S. EPA, re: Notification that EPA has received a draft Feasibility Study Report for the Commodore/MOS Superfund Site, 3/5/92. P. 301736-301736.

26. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Michael J. Clement, Wisler, Pearlstine, Talone, Craig, Garrity & Potash, re: Contractual arrangements prohibiting the use of well water in the facilities, 3/12/92. P. 301737-301737.

27. Letter to Mr. Richard Ng, Commodore Semiconductor Group, from Ms. Ruth Rzepski, U.S. EPA, re: U.S. EPA review of the revised RI/FS Report dated February 1992, 4/3/92. P. 301738-301781. The following are attached:

- a) a report entitled, Ages Laboratories Analytical Report for Commodore MOS Technology, April, 1984;
- b) general comments on the revised RI/FS Report;
- c) a memorandum regarding EPA's request to review and comment on Section 4.3.3 and

Appendix F of the RI/FS Report;

- d) a memorandum and information on the validity of the clusters given in the RI/FS Report and the validity of contour maps obtained by multiplying the average posterior probabilities by raw volatile organic concentrations (VOC) concentrations.
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- 28. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Kermit L. Rader, Manko, Gold & Katcher, re: Request for an extension of 45 days to revise the RI/FS Report for the site, 4/10/92. P. 301782-301783.
 - 29. Letter to Mr. Kermit Radar [sic], Manko, Gold & Katcher, from Ms. Ruth Rzepski, U.S. EPA, re: EPA's extension of the submission due date for the final RI/FS Report, 4/16/92. P. 301784-301785.
 - 30. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Mr. Kenneth W. Brown, U.S. EPA, re: Comments on the RI/FS Study for the Assistance Commodore Semiconductor/MOS NPL Site, 6/4/92. P. 301786-301791. The comments are attached.
 - 31. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Steven E. Jakatt, Roy F. Weston, Inc., re: Toxicity Profiles to be included in the Commodore RI Report and short-term pumping test results, 6/10/92. P. 301792-301828. The Toxicity Profiles and the short-term pumping test results from 12/18/90-12/20/90 are attached.
 - 32. Letter to Ms. Ruth Rzepski, U.S. EPA, from Terrie L. Swanson, Dynamac Corporation, re: Summary of June 10, 1992 meeting held between EPA, PADER, Dynamac, and Commodore representatives, 6/12/92. P. 301829-301834.
 - 33. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Richard C. Johnson, Roy F. Weston, Inc., re: Items for the RI/FS Report which have been revised in response to EPA comments of April 3rd and subsequent discussions between EPA, Commodore and Weston, 6/12/92. P. 301835-301855. The revisions are attached.
 - 34. Letter to Mr. David Kennedy, PADER, from Ms. Ruth Rzepski, U.S. EPA, re: Formal request for the chemical, location, and action specific ARARs for the

- site, 6/18/92. P. 301856-301856.
35. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. David C. Kennedy, PADER, re: Comments on the review of the draft Proposed Plan, 7/2/92. P. 301857-301858.
 36. Handwritten record of communication to file from Ms. Ruth Rzepski, U.S. EPA, re: Commodore ARAR request, 7/7/92. P. 301859-301859.
 37. Letter to Ms. Ruth Rzepski, U.S. EPA, from Terrie L. Swanson, Dynamac Corporation, re: Maximum Contaminant Level Exceedances Table, 7/14/92. P. 301860-301863. A table, Wells With Major Maximum Contaminant Level (MCL) and Proposed MCL (PMCL) Exceedance, July-August 1990 and December 1990-January 1991 Sampling Events, is attached.
 38. Memorandum to file from Ms. Ruth Rzepski, U.S. EPA, re: Clarification to the public that EPA will use the draft RI/FS Report dated February 1992 and revisions to the draft RI/FS Report dated June 12, 1992, for the selection of the proposed remedial alternative for the site, 7/14/92. P. 301864-301864.
 39. Table, Wells With Major Maximum Contaminant Level (MCL) and Proposed MCL (PMCL) Exceedance, July-August 1990 and December 1990-January 1991 Sampling Events, 7/14/92. P. 301865-301868. A facsimile transmittal form is attached.
 40. Memorandum to file from Ms. Ruth Rzepski, U.S. EPA, re: Estimated Total VOC Plume Boundary, 7/16/92. P. 301869-301870. A site map is attached.
 41. Letter to Mr. Richard Ng, Commodore Semiconductor Group, from Mr. Michael Towle, U.S. EPA, re: EPA's comments on the Remedial Investigation Site Operations Plan, the Quality Assurance Project Plan, Health and Safety Plan, and Data Management Plan, 6/23/89. P. 301871-301892. Comments on the Site Operations Plan and the Quality Assurance Project Plan are attached.
 42. Letter to Mr. Richard Ng, Commodore Semiconductor

Systems, from Mr. Michael Towle, U.S. EPA, re: EPA's approval, with conditions, of the Remedial Investigation Site Operations Plan for the RI/FS at the site, 9/18/89. P. 301893-301896. Comments on the plan are attached.

43. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. David C. Kennedy, PADER, re: State ARARs for the site, 1/31/91. P. 301897-301904. Two letters regarding ARARs determinations and a memorandum regarding ground water remediation are attached.
44. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Ms. Theresa A. Simpson, U.S. EPA, re: Inorganic data review, 3/14/91. P. 301905-301918. The review is attached.
45. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Ms. Theresa A. Simpson, U.S. EPA, re: Organic data review, 3/14/91. P. 301919-301992. The review is attached.
46. Letter to Ms. Ruth Rzepski, U.S. EPA, from Terrie L. Swanson, Dynamac Corporation, re: Data validation package for the split samples collected by Dynamac, 6/28/91. P. 301993-301997. A summary of split sample results for 12/90 and 1/91 is attached.
47. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Richard Ng, Commodore Semiconductor Group, re: Background groundwater levels, 7/3/91. P. 301998-301998.
48. Letter to Mr. Richard Ng, Commodore Semiconductor Group, from Ms. Ruth Rzepski, U.S. EPA, re: Background groundwater contaminant levels, 7/26/91. P. 301999-301999.
49. Sampling Results Data Package, (undated). P. 302000-302247. The following are attached:
 - a) an Organic Data Summary Form, Water Samples;
 - b) a letter regarding water samples for volatile analyses;
 - c) Contract Laboratory Data Package, Organic Data Review Worksheets;
 - d) Organic Regional Data Assessment;

- e) a letter regarding results for volatile organic analyses;
 - f) two Chain of Custody Records;
 - g) an Organic Traffic Report;
 - h) a Federal Express receipt;
 - i) a Special Analytical Service Packing List;
 - j) a Volatile Analysis Analytical Data Package.
50. Proposed Plan, Commodore Semiconductor/MOS Site, Lower Providence Township, Pennsylvania, (undated).
P. 302248-302269.
51. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Joseph R. Bonamico, Sr., Audubon Water Company, re: Information on wells 6 & 9, 4/9/92. P. 302270-302325. The following are attached:
- a) a letter regarding remedial wells for public use;
 - b) proceedings on behalf of the Audubon Water Company for wells no. 5 & 6, Docket No. D-71-205 CP;
 - c) proceedings on behalf of the Audubon Water Company for wells no. 5 & 6, Docket No. D-73-194 CP;
 - d) laboratory data for well no. 9;
 - e) laboratory data for well no. 6;
 - f) topics of concern identified by Audubon Water Company.
52. Letter to Ms. Ruth Rzepski, U.S. EPA, from Ms. Terrie L. Swanson, Dynamac Corporation, re: Field trip report, 5/28/92. P. 302326-302329.
53. Letter to Ms. Ruth Rzepski, U.S. EPA, from Ms. Terrie L. Swanson, Dynamac Corporation, re: Comments on

review of RI/FS report, 6/9/92. P. 302330-302332.

54. Letter to Mr. Kenneth W. Brown, U.S. EPA, from Mr. Charles T. Kufs, Roy F. Weston, Inc., re: Supporting information for the RI/FS, 6/23/92. P. 302333-302414. The following are attached:

- a) Table 1, Summary of five methods used to cluster ground water samples on the basis of geochemical indicators;
- b) Attachment 1, computer printouts for the Equal-Variances-Maximum-Likelihood Method Cluster Analyses;
- c) Attachment 2, computer printouts for the Average Linkage Method Cluster Analyses;
- d) Attachment 3, computer printouts for the Centered Method Cluster Analyses;
- e) Attachment 4, computer printouts for the Two-Stage Density Linkage Method Cluster Analyses.

55. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Richard Ng, Commodore Semiconductor Group (CSG), re: RI/FS supplemental work items addressed during the June 17, 1992, meeting, 6/25/92. P. 302415-302416.

56. Report: Remedial Investigation and Feasibility Study of the CSG Facility at 950 Rittenhouse Road, Norristown, Pennsylvania, Volume I, prepared by Roy F. Weston, Inc., 7/92. P. 302417-303423. A memorandum regarding receipt of two copies of the RI/FS report is attached.

57. Letter to Mr. Kenneth W. Brown, U.S. EPA, from Mr. Charles T. Kufs, Roy F. Weston, Inc., re: Supporting information for the RI/FS, 7/8/92. P. 303424-303462. The following are attached:

- a) a summary of descriptive statistics for assessing sample normality;
- b) 17 sheets of data on descriptive statistics;

- c) 12 sheets of data on normal probability plots and Kolmogorov distances;
 - d) six sheets of data on the listing of Kolmogorov distances.
- 58. Letter to Mr. Kenneth W. Brown, U.S. EPA, from Mr. Charles T. Kufs, Roy F. Weston, Inc., re: Supporting information for the RI/FS, 7/9/92. P. 303463-303480. The following are attached:
 - a) two charts on the minimum probability of belonging in the CSG cluster;
 - b) two charts on the maximum probability of belonging in the CSG cluster;
 - c) two charts on the average probability of belonging in the CSG cluster;
 - d) 10 charts on the evaluation of the probability of sample locations having geochemical profiles similar to CSG - Analysis variable.
- 59. Letter to Mr. Kenneth W. Brown, U.S. EPA, from Mr. Charles T. Kufs, Roy F. Weston, Inc., re: Supporting information for the RI/FS, 7/13/92. P. 303481-303499. A list of references cited and two articles entitled "Integrated Oil Exploration Decision Systems" and "Resolving the Percentage of Component Terrains Within Single Resolution Elements," respectively, are attached.
- 60. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Michael J. Clement, Wisler, Pearlstine, Talone, Craig, Garrity & Potash, re: Comments on the proposed remediation of the Commodore Site, 8/18/92. P. 303500-303501.
- 61. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Kermit L. Rader, Manko, Gold & Katcher, re: Comments on the Proposed Remedial Action Plan, 8/19/92. P. 303502-303513. The following are attached:
 - a) comments from Commodore Business Machines, Inc., on the Proposed Remedial Action Plan;
 - b) a list of residential water filters;

- c) a letter regarding the results of the water samples taken in December 1990 from the well supplying water to Mrs. Lamont's residence;
 - d) Table 1, Summary of the December 1990 Groundwater Quality Analyses, Commodore Site, PA;
 - e) a letter regarding results taken since September 1984 from the well supplying water to Mr. Hiram Fulmer's residence;
 - f) a summary of residential groundwater quality analyses, Commodore Site, PA, 1984-1989;
 - g) an envelope.
62. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Bruce D. Lombardo, Harvey, Pennington, Herting & Renneisen, Ltd, re: The Allen-Bradley Company's comments on the Proposed Plan, 8/20/92. P. 303514-303531. Fifteen pages of data on wells with major maximum contaminant level (MCL) and proposed MCL exceedance are attached.
63. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Mr. Kenneth W. Brown, U.S. EPA, re: Supporting information for the RI/FS, 8/26/92. P. 303532-303611. The following are attached:
- a) data for CSG cluster;
 - b) data for middle cluster (not affected by any source);
 - c) data for Non-CSG cluster;
 - d) Q-Q Plots for testing multinormality for three clusters;
 - e) Q-Q Plots for testing univariate normality for the six variables for the three clusters;
 - f) comments from Dr's A.K. and Anita Singh on the results of five different clustering methods and parametric MANOVA and

nonparametric ANOVA, values of Kolmogorov-Smirnov distances, probability maps, and rationale behind some of the computations;

- g) histogram plots for the six variables, for each cluster;
- h) paper entitled "Omnibus Robust Procedures for Assessment of Multivariate Normally and Detection of Multivariate Outliers."

64. Comments of Commodore Business Machines, Inc. to the Proposed Remedial Action Plan for the Commodore Semiconductor/MOS Site, Lower Providence Township, Pennsylvania, 9/14/92. P. 303612-303621. The following are attached:

- a) information on residential water filters;
- b) a letter regarding the results of the well water samples taken in December 1990 from the Lamont residence;
- c) Table 1, Summary of the December 1990 Groundwater Quality Analyses, Commodore Site, PA;
- d) a letter regarding the results of the well water samples taken since September 1984 from the Fulmer residence;
- e) a table containing the summary of residential groundwater quality analyses from the Commodore Site during the years 1986-1989.

65. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. David Kennedy, PADER, re: Comments on the review of the draft Record of Decision (ROD), 9/15/92. P. 303622-303623.

66. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Bruce D. Lombardo, Harvey, Pennington, Herting & Renneisen, Ltd., re: Supplemental comments to the Proposed Plan submitted by the Allen-Bradley Company, 9/18/92. P. 303624-303625. This letter refers to entry number 64.

67. Report: Feasibility Study Cost Evaluation Report, Commodore MOS Site, Norristown, Pennsylvania, prepared

by Dynamac Corporation, 9/21/92. P. 303626-303745.

68. Letter to Mr. Richard Ng, Commodore Semiconductor Systems, from Ms. Ruth Rzepski, U.S. EPA, re: Request for the elimination of the Focused Feasibility Study dated March 22, 1991, 4/12/91. P. 303746-303747.
69. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Ms. Terrie L. Swanson, Dynamac Corporation, re: Comments on Alternative 2, specifically, focusing on residential wells, 4/2/92. P. 303748-303748.
70. Telephone conversation record of Ms. Ruth Rzepski, U.S. EPA, with Mr. Richard Ng, Commodore Semiconductor Group, re: Disapproval of revisions concerning statistical modeling, 7/10/92. P. 303749-303749.
71. Telephone conversation of Ms. Sarah Keating, U.S. EPA, with Ms. Ruth Rzepski, U.S. EPA, re: Problems with the new point of contact for Commodore Semiconductor Group, 7/13/92. P. 303750-303750.
72. Letter to Mr. Edwin B. Erickson, U.S. EPA, from Mr. Joseph M. Manko, Manko, Gold & Katcher, re: Expedition of EPA soil sampling of nearby facilities, 7/29/92. P. 303751-303752.
73. Letter to Mr. Joseph Manko, Manko, Gold & Katcher, from Mr. Edwin B. Erickson, U.S. EPA, re: Information on site inspection and soil sampling, 8/7/92. P. 303753-303754.
74. Memorandum to file from Ms. Ruth Rzepski, U.S. EPA, re: Clarification to the public about the utilization of the PRP's July 13, 1992 RI/FS Report, 9/4/92. P. 303755-303755.
75. Letter to Ms. Ruth Rzepski, U.S. EPA, from Ms. Terrie L. Swanson, Dynamac Corporation, re: Revised remedial costs for vapor phase carbon units, 9/25/92. P. 303756-303757. A table on comparison of costs accounting for vapor carbon unit installation is attached.
76. Letter to Ms. Ruth Rzepski, U.S. EPA, from Terrie L. Swanson, Dynamac Corporation, re: Revised tables, 9/25/92. P. 303758-303764. The following are

attached:

- a) a site map;
 - b) a table on the summary of alternative costs for remedial implementation;
 - c) a table on the summary of groundwater analysis, 1989-1990;
 - d) a table on the wells with major maximum contaminant level (MCL) and proposed MCL (PMCL) exceedance, 1990 sampling events.
77. Letter to Mr. Edwin B. Erickson, U.S. EPA, from Mr. James W. Rue, PADER, re: Concurrence with the ROD, 9/28/92. P. 303765-303767.
78. Record of Decision, Commodore Semiconductor Group Superfund Site, Declaration, 9/29/92. P. 303768-303891.
79. Report: (Revised) Remedial Investigation and Feasibility Study of the CSG Facility at 950 Rittenhouse Road, Norristown, PA, prepared by Roy F. Weston, Inc., 7/92. P. 303892-304510. The revision is the deletion of Appendix F, as noted in the Table of Contents. The appendices are not attached. See page 304557 for a letter describing the revision.
80. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Kenneth W. Brown, U.S. EPA, re: Comments and recommendations provided by Dr. Anita Singh, 10/21/92. P. 304511-304512.
81. Letter Ms. Ruth Rzepski, U.S. EPA, from Mr. Kenneth W. Brown, U.S. EPA, re: Recommendation not to accept RI/FS report based on statistical assessment, 10/22/92. P. 304513-304513.
82. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Richard Ng, Commodore International Limited, re: Notification of the installation of a carbon filtration system at 2705 Audobon Road, 11/20/92. P. 304514-304514.
83. Letter to Mr. J. Edward Goff, Commodore International Limited, from Ms. Ruth Rzepski, U.S. EPA, re: Request

for text revisions to the RI/FS Report dated July 1992 found to be unacceptable, 11/23/92. P. 304515-304515.

84. Letter to Mr. Don Henne, U.S. DOI, from Ms. Ruth Rzepski, U.S. EPA, re: Formal notification of delivery of two copies of the RI/FS reports, 11/25/92. P. 304516-304516.
85. Letter to Ms. Ruth Rzepski, U.S. EPA from Mr. J. Edward Goff, Commodore International Limited, re: Submittal of six copies of RI/FS revisions to serve as replacement pages, 12/11/92. P. 304517-304517.
86. Letter to Mr. Don Henne, U.S. DOI, from Mr. Charles R. Wood, U.S. DOI, re: Review of documents in the RI/FS concerning the validity of the conclusions, 12/15/92. P. 304518-304519. A routing and transmittal slip is attached.
87. Letter to Ms. Sarah Keating, U.S. EPA, from Mr. J. Edward Goff, Commodore International Limited, re: Recommendation that ICI Americas be issued a special notice letter, 1/12/93. P. 304520-304520.
88. Report: Documentation of Soil Sample Collection at the ICI Americas Site, 850 Rittenhouse Road, Lower Providence Township, PA, prepared by Geo-Environmental Consultants, Inc., 1/12/93. P. 304521-304554.
89. Letter to Mr. Richard Ng, Commodore International Limited, from Ms. Ruth Rzepski, U.S. EPA, re: RI/FS revisions, 2/17/93. P. 304555-304555.
90. Letter to Mr. Richard Ng, Commodore International Limited, from Ms. Ruth Rzepski, U.S. EPA, re: Approval of RI/FS report, 3/3/93. P. 304556-304556.
91. Letter to file from Ms. Ruth Rzepski, U.S. EPA, re: Revision to the RI/FS Report dated July 1992, 3/30/93. P. 304557-304557.
92. Explanation of Significant Differences (ESD) for the Commodore Semiconductor Group Site, 5/5/93. P. 304558-304563. A cover memorandum dated April 26, 1993 regarding a request for concurrence with the ESD and a letter dated April 16, 1993 regarding PADER's review of and concurrence with the ESD are attached.
93. Letter to Mr. Malcom Cronlund, Repap Technologies,

Inc., from Ms. Sarah Keating, U.S. EPA , re:
Confidentiality status of information submitted by
Repap Technologies, Inc. in response to a 104(e)
inquiry, 10/14/92. P. 304564-304566.

94. Letter to Ms. Heather Winett, ICI Americas, Inc., from Ms. Sarah Keating, U.S. EPA, re: Confidentiality status of information submitted by ICI Americas, Inc. in response to a 104(e) inquiry, 10/14/92. P. 304567-304569.
95. Letter to Ms. Sarah Keating, U.S. EPA, from Ms. Daria L. Killinger, ICI Americas, Inc., re: Response to a letter notifying ICI Americas, Inc. of its status as a Potentially Responsible Party (PRP), 4/1/93. P. 304570-304570.
96. Letter to Ms. Sarah Keating, U.S. EPA, from Mr. Robert L. Collings, Morgan, Lewis & Bockius, re: Request for EPA to withdraw the notice letter to ICI Americas, Inc. pending potential use of the letter by Commodore Business Machines, Inc. in a lawsuit as evidence of ICI Americas, Inc.'s liability, 5/3/93. P. 304571-304571.

IV. REMOVAL RESPONSE PROJECTS

1. Region III Incident Notification Report, Commodore Semiconductor Group, 3/23/89. P. 400001-400001.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL CORRESPONDENCE/IMAGERY

1. First and Second Floor Plans Laboratory Services Map, Robert E. Lamb, Incorporated, 2/16/70. P. 500001-500001.
2. Newspaper Article entitled "Worcester, Lower Providence Are Targeted for Clean-Ups," The Times Herald, 1/31/87. P. 500002-500002.
3. Letter to Ms. Humane Zia, U.S. EPA, from Mr. Gary M. Hacker, Versar, Inc., re: Photos from the February 10, 1987 site visit, 3/4/87. P. 500003-500009. The photos are attached.
4. Valley Forge Facility Proposed Layouts Map, Commodore, 2/25/88. P. 500010-500010.
5. Letter to Ms. Suzanne Billings, U.S. EPA, from Ms. Alicia Fleitas, Versar, Inc., re: March 3, 1988 site visit photos, 4/13/88. P. 500011-500017. The photos are attached.
6. Letter to Ms. Rose Harvell, U.S. EPA, from Mr. Bruce R. Pluta, CDM, re: Final Community Relations Plan, 2/14/89. P. 500018-500041. The plan is attached.
7. U.S. EPA Public Notice, Commodore Semiconductor Group Superfund Site, (undated). P. 500042-500042.